

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

DEFENDANTS' JOINT MOTION TO RESTRICT

Pursuant to General Local Rule 79(d), Defendant Netflix, Inc., Chrome Media LLC, Moira Demos, and Laura Ricciardi (collectively, “the Defendants”) submit this Motion to Restrict (“Motion”) in connection with their Joint Response to Plaintiff Andrew Colborn’s Additional Proposed Findings of Fact (“Joint Response”). In support of this Motion, the Defendants state as follows:

1. Pursuant to the Court’s Order granting the parties’ Joint Motion to Amend the Scheduling Order (Dkt. 297), the Defendants are filing their summary judgment reply briefs today, December 9, 2022.

2. As part and in support of their summary judgment reply briefs, and in compliance with Local Rule 56(b)(3), the Defendants file their Joint Response to Plaintiff Andrew Colborn’s Additional Proposed Findings of Fact (“CAPFF”). Therein, the Defendants cite to certain materials in the record currently filed under restriction and on which the Court has not yet ruled.

3. Because these records were designated confidential by parties other than the Defendants, they take no position regarding whether good cause exists for them to remain restricted from public access.

4. As the Joint Response discusses the content of a currently-restricted document, the Defendants now file a redacted version of the Joint Response conventionally and an unredacted version under restriction.

Dated: December 9, 2022

Respectfully submitted,

s/ Leita Walker

Leita Walker
Isabella Salomão Nascimento
Ballard Spahr LLP
2000 IDS Center, 80 South 8th Street
Minneapolis, MN 55402-2119
T: (612) 371-6222
F: (612) 371-3207
walkerl@ballardspahr.com
salamaonascimento@ballardspahr.com

Matthew E. Kelley
Emmy Parsons
Ballard Spahr LLP
1909 K Street, NW, Suite 1200
Washington, D.C. 20006-1157
T: (202) 508-1112
F: (202) 661-2299
kelley@ballardspahr.com
parsonse@ballardspahr.com

Counsel for Netflix, Inc.

s/ Kevin L. Vick

Kevin L. Vick (*pro hac vice*)
Meghan Fenzel (*pro hac vice*)
JASSY VICK CAROLAN LLP
355 South Grand Avenue, Suite 2450
Los Angeles, CA 90071
T: (310) 870-7048

F: (310) 870-7010
kvick@jassyvick.com
mfenzel@jassyvick.com

*Counsel for Defendants Laura Ricciardi,
Moira Demos, and Chrome Media, LLC*

s/ James A. Friedman

James A. Friedman
Godfrey & Kahn, S.C.
One East Main Street
Suite 500
Madison, WI 53703-3300
T: (608) 284-2617
F. (608) 257-0609
jfriedman@gklaw.com

Counsel for all Defendants